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*Attorneys for Proposed Intervenor  
Savant Neglected Diseases LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

MADISON JOINT VENTURE LLC,

*Plaintiff,*

v.

CHEMO RESEARCH S.L., EXELTIS  
USA, INC., and SERGIO SOSA-  
ESTANI,

*Defendants.*

Case No. 2:19-cv-8012-JMV-SCM

Electronically filed

**SAVANT NEGLECTED DISEASES  
LLC'S NOTICE OF MOTION TO  
INTERVENE AND FOR A STAY**

**PLEASE TAKE NOTICE** that on November 2, 2020, at 9:00am, or as soon thereafter as counsel may be heard, the undersigned attorneys for Savant Neglected Diseases LLC ("Savant"), will apply to the Honorable Judge John Michael Vazquez, U.S.D.J., Lautenberg U.S. Post Office & Courthouse, Federal Square, Newark, New Jersey 07101, for an Order granting Savant's Motion to Intervene and for a Stay.

**PLEASE TAKE FURTHER NOTICE** that in support of said Motion, Savant will rely upon the papers submitted herewith and any reply papers submitted thereafter.

**PLEASE TAKE FURTHER NOTICE** that Savant respectfully requests oral arguments if this Motion is contested.

Dated: October 9, 2020

/s/ Megan Dubatowka

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**CERTIFICATION OF SERVICE**

I hereby certify that on October 9, 2020, copies of the foregoing Notice of Motion with Proposed Order, and the accompanying Memorandum of Law and Declaration of Megan Dubatowka with supporting exhibits, were served upon all counsel of record by notice of electronic filing. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

/s/ Megan Dubatowka  
Megan Dubatowka